

EXHIBIT "A"**RICO STATEMENT****QUESTION #2**

DEFENDANT	MISCONDUCT	BASIS OF LIABILITY
Bakr bin Laden, Tarek bin Laden, and Omar bin Laden	<p>Bakr Bin Laden, Omar Bin Laden, and Tarek Bin Laden have long provided financial support and other forms of material support to terrorist organizations including but not limited to Radical Muslim Terrorism, or the al Qaeda, and/or the International Islamic Front for the Jihad Against Jews and Crusaders. Bakr, Omar, and Tarek Bin Laden conducted or participated directly and/or indirectly in the conduct of the Enterprise's affairs and participated in the operation or management of the operation of the Enterprise itself. Bakr, Omar, and Tarek Bin Laden conspired to conduct and/or participate in the operation or management of the enterprise itself.</p> <p>Saudi Bin Laden Group (SBG), a.k.a. Saudi Binladen Group, a.k.a. Saudi Bin Laden Group, a.k.a. Binladin Corporation, is based in Jeddah, Saudi Arabia.</p> <p>SBG is run by Bakr M. bin Laden, son of Mohammed bin Laden. The eldest son, Salem bin Laden, ran the group until his accidental death in 1988. SBG's board of directors include Saleh Gazaz, Mohammed Bahareth, Abdullah bin Said, Mohammed Nur Rahimi, Tarek M. bin Laden, and Omar M. bin Laden.</p> <p>Until at least 2001, SBG, under the leadership of Tarek, Omar, and Bakr Bin Laden, maintained a business address in the United States:</p> <p style="text-align: center;">Saudi Binladin Group Monroe St. Suite 1700 Rockville, Maryland 20850 Contact Person: Philip J.Griffin Tel: 1-301-738 8836/ 1-301-738 8802</p> <p>The Exports section of the SBG website states:</p> <p style="text-align: center;">“The products of SBG manufacturing companies located in Europe and the Middle and Far East are exported through</p>	1962(a) 1962(c) 1962(d)

	<p>the group's trading and distribution network to eighteen countries."</p> <p>The U.S. is one of the eighteen countries listed. As directors of SBG, Tarek, Omar, and Bakr bin Laden profit from these commercial exchanges to and from the United States.</p> <p>Omar bin Laden is a 1974 graduate of the University of Miami and is listed in the University of Miami alumni directory.</p> <p>Omar bin Laden has an investment and management stake in Massachusetts-based Worldcare Ltd., one of the largest telemedicine companies in the world.</p> <p>Omar bin Laden was living in Falls Church, Virginia with his brother Abdullah bin Laden on September 11th, 2001. Abdullah bin Laden was the director of the U.S. branch of the World Assembly of Muslim Youth (WAMY). WAMY is an important source of funding for al Qaeda activities.</p> <p>In the mid-1990s, Omar and his brother, Abdullah bin Laden, were investigated by the FBI for their connections to WAMY and al Qaeda.</p> <p>WAMY was founded in 1972 in a Saudi effort to prevent the "corrupting" ideas of the western world influencing young Muslims. With official backing, it grew to embrace 450 youth and student organizations with 34 offices worldwide. WAMY has been officially identified as a "suspected terrorist organization" by the FBI since 1996 and has been the subject of numerous governmental investigations for terrorist activities.</p> <p>Bakr bin Laden is a 1973 graduate of the University of Miami. He also attended Harvard Law School.</p> <p>Bakr bin Laden has donated millions of dollars to Harvard University for Islamic legal studies and architecture programs.</p> <p>Bakr bin Laden controlled \$2 million in SBG funds in the Washington, DC-based Carlyle Group private investment firm until after September 11, 2001.</p>	
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	<p>believed by the Department of Justice to have funded Osama bin Laden during the 1990s.</p> <p>In the days following September 11, 2001, the U.S. Department of Justice issued a request for judicial assistance to the Government of Switzerland regarding its investigation of Bin Laden family companies and affiliated bank accounts and financial transactions in Europe.</p> <p>A Deutsche Bank compliance document regarding Deutsche Bank's account holder Cambridge Engineering Systems states:</p> <p style="padding-left: 40px;">Cambridge Engineering Systems is a [Deutsche Bank] relationship that has its primary accounts with Deutsche Bank AG New York.</p> <p>The Department of Justice wrote:</p> <p style="padding-left: 40px;">Investigators believe that Osama Bin Laden has received funding from two accounts at Deutsche Bank in Geneva, Switzerland, in the names of Cambridge Engineering and the Saudi Bin Laden Group. The Saudi Bin Laden Group is the holding company for the Bin Laden family interests in the United States. It is believed that Cambridge Engineering Systems, Ltd., is the account through which the Saudi Bin Laden Group conducted its private banking and whose account holders are believed to be the half brothers of Osama Bin Laden. The investigation thus far reflects that Osama Bin Laden was a shareholder in the Saudi Bin Laden Group and received a buyout payment which, if it occurred, may assist in establishing a violation of U.S. laws that make it illegal to provide material support to foreign terrorist organizations.</p> <p>The Department of Justice expressed its belief that approximately \$300 million was transferred through these Deutsche Bank accounts in 2000 to accounts in Pakistan "belonging jointly to Osama Bin Laden and a person of</p>	
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	<p>Pakistani nationality.”</p> <p>Bakr Bin Laden is an authorized agent and beneficial owner of Cambridge Engineering Systems Ltd. As such, Bakr Bin Laden had authority over these accounts to distribute funds to designated recipients including Osama bin Laden.</p> <p>Cambridge Engineers Systems Ltd. documents show that Bakr Bin Laden is also authorized to manage the Cambridge Engineering Systems accounts located at <i>Deutsche Bank</i> which are suspected by the Department of Justice to be used as a covert vehicle for financing al Qaeda.</p> <p>Along with Bakr Bin Laden, the Saudi Bin Laden Group is listed as a 100 percent beneficial owner of Cambridge Engineering Systems Ltd. As such, the Saudi Bin Laden Group and its officers, including Omar, Bakr, and Tarek Bin Laden, had ultimate control over the funds in these accounts which were used to divert large sums of covert funding to Osama Bin Laden throughout the 1990s after it was widely known that he was sponsoring terrorist attacks against United States interests.</p> <p>According to the Department of Justice investigation, on August 20, 1999, the New York branch of Cambridge Engineering Systems, Cambridge Engineering Systems New York, transferred \$56,095.89 to the same Deutsche Bank account under investigation by the U.S. government for financing Osama bin Laden’s terrorist acts against the United States.</p> <p>Spanish authorities investigating Al Qaeda connections to certain individuals in Spain seized documents belonging to Bassam Dalati Satut, an individual alleged to be a member of the Spanish al Qaeda cell. On one of the seized documents, Farid Quraishi is listed as the General Director of IIRO, a known al Qaeda financing front.</p> <p>On the aforementioned document the address listed below Quraishi’s name is P.O. Box 4843, Jeddah, Kingdom of Saudi Arabia. The same address is listed on SBG’s website in 2001 as that of Project Management & Development Co. Real Estate Limited, the real estate division of the Saudi Binladin Group.</p>	
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	<p>Bakr, Tarek, and Omar Bin Laden have continued to communicate with and provide financial assistance to Osama Bin Laden even after they were fully aware that he was involved developing an international terrorist network focused on carrying out terrorist attacks against the United States and other western countries.</p> <p>A member of the Bin Laden family spoke about the Bin Laden brothers' financial support to Osama during the 1990s stating:</p> <p style="padding-left: 40px;">[O]sama would ring up the family for money and once asked for \$50 million dollars. We would send it to him for his Afghan and Sudanese adventures. It was his money ...</p> <p>As officers of the Mohammed Bin Laden Organization (a.k.a. Bin Ladin Organization, a.k.a. Bin Laden Foundation) Tarek, Omar and Bakr Bin Laden were all actively involved in the recruitment, training and financial and material sponsorship of mujahideen via the Bin Laden Organization office in Cairo, Egypt and the SBG offices in Saudi Arabia.</p> <p>Beginning in the mid-1980s, aspiring jihadists who visited the Bin Laden brothers' office in Cairo, Egypt, at 9 Arab University Street, were swept into an all expense paid life in the global jihadist network which funneled recruits from the Bin Laden Organization offices in Cairo to the Saudi Bin Laden Group offices in Saudi Arabia and on to sympathetic Islamic charities and safe-houses in Pakistan and Afghanistan for terrorist training. The offices in Cairo were closed in 1993.</p> <p>As a result of Bin Laden's extremist activities, Saudi authorities "revoked the permit given to regional travel coordinator Osama Bin-Laden, in accordance with which passports had been issued for those sponsored by his agency or the agency of his major partners."</p> <p>In 1993, five years after the establishment of al Qaeda and four years after the complete Soviet withdrawal from Afghanistan, more than 700 Arab fighters were employed by the Bin Laden Organization in Cairo and its 15 affiliated institutions worldwide.</p>	
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	<p>The Bin Laden Group negotiated a concession to develop gold resources at Wadi Madan, in Hadhramout, where discoveries were made in the early 1980s by Soviet state companies.</p> <p>An APS source says they are interested in farming into Masila Block 14, where Canadian Occidental Petroleum has found about 500 million barrels of oil in place. Oil discoveries made so far are of the 29.5-32.7x API range. So far five of the nine wells drilled there have been successful. It is believed this block could produce between 200,000-250,000 b/d. This capital was to be in part to subsidize Osama's operations.</p> <p>Yeslam bin Laden, member of the Bin Laden family, is the former chief financial officer of the Bin Laden Organization, a subsidiary of SBG involved in Sudan in Saudi Arabia, and a board member of the Mohammed bin Laden Organization, a wholly-owned subsidiary of SBG, along with Saleh Gazaz, Mohamed Bahareth, Abdullah Bin Said, Mohamed Nur Rahimi, Bakr M. Bin Laden, Tarek M. Bin Laden, and Omar M. Bin Laden.</p> <p>Yeslam Bin Laden provided material support to his brother, Osama Bin Laden and the al Qaeda international terrorist network. This material support includes, but is not limited to, the acts of material support specified herein. The material support provided to Osama Bin Laden by his brother Yeslam Bin Laden was a proximate cause of the attacks of September 11, 2001 on the United States and the Plaintiffs.</p> <p>In 2000 and 2001, Yeslam Bin Laden made donations to the Muslim World League Cultural Center in Geneva, which aided, abetted, and materially supported Hani Ramadan, a member of the al Qaeda network.</p> <p>SICO, a company controlled by Yeslam, received \$10 million from SBG in management funds during the 1990s.</p> <p>An international network was developed by Tarek, Omar, Yeslam, and Bakr bin Laden in collaboration with their brother Osama, and served as a foundation for al Qaeda to expand its operations in the early 1990s.</p>	
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	<p>In an interview with Peter Arnett on CNN, Osama bin Laden revealed that on nine different occasions, his mother, uncle, and brothers had visited him in Khartoum, Sudan.</p> <p>In 1994, Bakr Bin Laden, head of the Bin Laden family's business empire, visited Osama bin Laden in Sudan with Osama's elderly uncle Abdullah, their father's brother.</p> <p>The visit took place after Osama Bin Laden directed his al Qaeda operatives to carry out attacks against American targets in Somalia and Yemen and after his affiliates bombed the World Trade Center in New York.</p> <p>Bakr Bin Laden was also on notice that Osama bin Laden was using his family fortune and funds raised from charities and wealthy individuals to finance a global campaign of Islamic terrorism.</p> <p>Bakr Bin Laden's visits to Osama Bin Laden did not stop in 1994. After Osama moved his family and al Qaeda network to Afghanistan in 1996, Bakr continued to visit the terrorist leader despite worldwide recognition that he was financing and materially supporting a transnational terrorist network.</p> <p>In the mid-to-late 1990s, officials from the U.S. government began focusing on al Qaeda's financing network. After reviewing available intelligence, one thing was clear, "...a lot of money being raised was coming from people in Saudi Arabia."</p> <p>Based on these investigative discoveries, U.S. officials visited Saudi Arabia in an effort to obtain cooperation and additional information on terrorist financing. Senior U.S. counterterrorism official William Wechsler paid the Saudis a visit in 1995, followed by Richard Newcomb in 1998:</p> <p>Despite Saudi promises to provide additional information and support, little was forthcoming in the months after the visit[s]. The Saudis protested [the] focus on continuing contacts between Osama and his wealthy, influential family, who were</p>	
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	<p>supposed to have broken all ties with him years before. “How can we tell a mother not to call her son?” [the Saudis] asked.</p> <p>As the current leader of the Bin Laden family and its network of companies, Bakr Bin Laden served as Osama Bin Laden’s protector in the Kingdom of Saudi Arabia from 1994 until the present day.</p> <p>After Osama Bin Laden was forced to leave the Kingdom in 1991 due to his Islamic militant activities, Bakr Bin Laden and fellow <i>Burnett</i> defendant, Khalid Bin Mahfouz, intervened before Prince Nayef and Prince Sultan to ensure that Osama Bin Laden’s business and financial interests would remain untouched.</p> <p>The internal protection secured by Khalid bin Mahfouz and Bakr Bin Laden from the Saudi royal family enabled Osama bin Laden to transfer tens of millions of dollars in Saudi-based assets to Sudan to finance the construction and maintenance of terrorist training camps and to carry out attacks on U.S. interests as early as 1992.</p> <p>At the 2001 wedding of his son, Mohammad, Osama bin Laden read a poem describing the destruction of the USS Cole as the wedding audience cheered. Among those who attended the wedding were “bin Laden’s mother, two brothers, and a sister who flew to Kandahar from Saudi Arabia.”</p> <p>A State Department fact sheet on Osama bin Laden, dated August 14, 1996, mentioned his operations in Sudan beginning in 1983:</p> <p>In a 1994 interview, Bin Ladin claimed to have surveyed business and agricultural investment opportunities in Sudan as early as 1983.</p> <p>In Sudan, Osama bin Laden worked closely with the Islamic hard-line northern militia controlled by Hassan Al Turabi, who took power in 1989 with a coup that removed Sadiq El Mahdi from power and installed a fundamentalist Islamic government.</p> <p>A Human Rights Watch report on Sudan mentioned that:</p>	
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	<p>In 1990-91 Turabi...established a regional umbrella for political Islamist militants, the Popular Arab Islamic conference (PAIC), headquartered in Khartoum. It was formed with the immediate aim of opposing American involvement in the Gulf War. Turabi became its secretary general. Under his guidance, the Sudan government created an open-door policy for Arabs, including Turabi's Islamist associate Osama bin Laden, who made his base in Sudan in 1990-1996.</p> <p>When Hassan Al Turabi took power in 1989, Sudan became an operational base for international Islamic terrorism groups, as reported by the State Department annual <i>Patterns of Global Terrorism</i> for 1991:</p> <p>Terrorist and militant Moslem groups have increased their presence in Sudan. The government reportedly has allowed terrorist groups to train on its territory and has offered Sudan as a sanctuary to terrorist organizations. (...) The National Islamic Front (NIF), under the leadership of Hassan al-Turabi, has intensified its domination of the government of Sudanese President General Bashir and has been the main advocate of closer relations with radical groups and their sponsors.</p> <p>Even though Osama Bin Laden was forced to leave the Kingdom of Saudi Arabia in 1991 and was officially stripped of his nationality in April 6, 1994 due to his terrorist activities, Bakr, Tarek, and Omar Bin Laden, as directors of SBG, continued to provide him with finances, equipment, and engineering support which enabled Osama Bin Laden to complete the public works projects in Sudan.</p> <p>This commingling of assets and strategic investments between Tarek, Bakr, and Omar Bin Laden, SBG, and Osama Bin Laden allowed Osama to buy the protection of the Sudanese regime and, as a result, further develop his al Qaeda terrorist network at a crucial period of growth</p>	
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	<p>during the early 1990s.</p> <p>Various sources confirmed that the Sudanese construction company set up by Osama Bin Laden, Al-Hijra for Construction and Development was a part of SBG.</p> <p>Hasan Al-Turabi, himself, confirmed this fact:</p> <p>[Shaykhali] Your ties with Osama Bin Laden raise many questions. Bin Laden stayed in Sudan for years, you harboured him, and then you kicked him out. This relationship seems suspicious. What is the truth about this relationship?</p> <p>[Turabi] For those who know nothing about Saudi Arabia, Bin Laden has the biggest family and construction company that builds roads and institutions. He came to Sudan as a branch of this company. He built the road linking Khartoum to the north, which could have been extended to reach Port Sudan. He also built the Port Sudan airport. He stayed away from the social life in Sudan. He also set up an agriculture project in Sudan. He was a struggler, and he had full US and Arab backing when he was struggling in Afghanistan. After that, he was not expelled from Sudan by the Sudanese and did not leave because he hated Sudan. He just did not want to cause an embarrassment in the relations with Saudi Arabia, which stripped him of his nationality”.</p> <p>During his tenure in Sudan from 1991-96, Osama Bin Laden, with the assistance of the SBG, and his brothers Tarek, Omar and Bakr Bin Laden, participated in the construction of the Tahaddi road and the Port Sudan Airport.</p> <p>An agreement for the construction of an airport in Port Sudan was signed on February 14, 1990, between the Sudanese Government and the Saudi-based Bin Laden International Company. Engineer Siddiq Wali said that</p>	
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	<p>construction of the airport will take two years. He said the airport will be used as an alternative to Khartoum airport in emergency circumstances.</p> <p>Siddiq Wali, engineer of SBG on the airport project, described the role of SBG in materially supporting Osama bin Laden, when he told the BBC that the total construction cost of the airport construction was \$39.5 million.</p> <p>A large part of the equipments used by Al-Hijrah for Construction and Development, for the construction of the Tadahhi Road and the Port Sudan Airport was brought back from Afghanistan. In addition, the Bin Ladens directed Afghan war veterans and recruits from the Bin Laden offices in Cairo and Jeddah to Sudan to oversee these projects:</p> <p>Bin Laden's work force grew to include militant Afghan war veterans seeking to avoid a return to their own countries, where many stood accused of subversive and terrorist activities. In May 1993, for example, Bin Ladin financed the travel of 300 to 480 Afghan war veterans to Sudan...</p> <p>The significant operational nexus between Osama Bin Laden, the Sudanese government, and Omar, Tarek, and Bakr Bin Laden (via SBG) was emphasized during the inauguration ceremony of the Port Sudan airport:</p> <p>Osama bin Laden was the first guest invited to attend the inauguration of the new Port Sudan Airport. He sat in the front row and was the guest of honor in the ceremony. It was a group of Bin Laden's companies that carried out the project of the new and modern airport that cost huge amounts of money...</p> <p>The airport was funded by the Saudi Government and was presented to Sudan by the Chairman of the Saudi Development Bank in cooperation with Omar Muhammad Bin Laden, Osama's half</p>	
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	<p>brother, and Abu Bakr Al Humayd, director of Bin Laden's group of companies in Dubai, Malaysia, Lebanon and Saudi Arabia. During the airport inauguration ceremony, Bin Laden donated \$2.5 million to establish and operate the airport, the second largest international airport in Sudan after the one in Khartoum</p> <p>....</p> <p>In addition, on a tape recording of the Port Sudan Airport inauguration filmed by Sudanese TV, Omar Bin Laden, as a representative of SBG, appeared as one of the main speakers for the event, along with Sudanese officials.</p> <p>According to official court testimony, Sharif al Din Ali Mukhtar was the principal director of Al Hijra for Construction and Development. Sharif al Din Ali Mukhtar was head of Islamic Relief Agency in Jeddah. He was expelled from Saudi Arabia in April 1991, and killed in chopper crash over Southern Sudan on September 1993. He was the brother of the deputy chief of Sudanese Military Intelligence.</p> <p>Other Al-Hijra executives are directly involved in Al-Qaeda and terrorist operations. Among them was Abu Rida al Suri, a.k.a., Mohamed Bayazid. He supplied weapons and equipment to the al Qaeda organization.</p> <p>All of these Al-Hijra managers were directly involved in the construction of the Tadahhi road and Port Sudan Airport. Consequently, they worked in direct collaboration with SBG in completing these significant projects.</p> <p>The Sudanese viewed him [Osama Bin Laden] as an investor who came to support the Islamic Project, declared Dr. Hasan Al-Turabi...Financial circles in Sudan estimated the money that Bin Laden brought with him into Sudan at \$350 millions... Osama Bin Laden was a "moving bank" for the Sudanese Government. He saved the Government from many of the problems he faced.</p>	
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	<p>As Khalid Khalil Assad, a <i>mujahid</i> close to the Bin Laden family explains, Tarek, Omar, and Bakr Bin Laden collaborated with Osama Bin Laden in providing enormous financial contributions to the jihadist network which eventually morphed into al Qaeda:</p> <p>The first road went through the branch of Bin Laden's establishment in Cairo, which handled the travel of huge numbers of Egyptian workers to Saudi Arabia to work on the expansion of the two holy shrines which his father's company was the main contractor for. The company had open orders from the Saudi Ministry of Interior, without oversight from the Saudi Embassy in Cairo, to import skilled labor, technicians and engineers for the [Grand Mosques] project. Among the huge labor force were large numbers of fundamentalists and Islamists wising to join the ranks of the Mujahideen being secretly recruited with the consent of Osama bin Laden personally.</p> <p>Osama bin Mohammad bin Laden opened a huge guest-house for them in Jeddah, which he called the House of the Ansar (allies of the prophet), and which operated as a transit point for eventual travel to Peshawar. A volunteer normally waited there for a few days before his travel documents were ready.</p> <p>... [T]he grant that the Bin Laden Foundation extended to those wishing to travel to Egypt reached 300 dollars a month, of which a Mujahid would receive 180 dollars from the branch of the establishment in Cairo and the rest upon leaving for Jeddah, where the Mujahideen would be received by company representatives who would take their Egyptian passports and give them other travel documents. After spending ten days at the House of Ansar, which was teeming with volunteers from Arab, Asian and other</p>	
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	<p>Islamic countries, the Mujahideen would head directly to Jeddah International Airport to travel to the border city of Peshawar [Pakistan].</p> <p>Tarek Bin Laden was the worldwide director of the International Relief Organization during this period in the early 1990s.</p> <p>According to Dr. Ahmed Mohammed Ali, Secretary General of the MWL, the MWL provides “humanitarian assistance” through the arms of IIRO.</p> <p>IIRO is closely intertwined with the SAAR Network and the more than one-hundred businesses and individuals that comprise it. This Network is a front for the sponsor of al Qaeda and international terror.</p> <p>According to an Arabic publication, Tarek bin Laden had a prominent role in 1990 at the IIRO:</p> <p style="padding-left: 40px;">Tarek bin Laden has been a member of the IIRO in MWL for ten years. He has been working quietly for the orphans and the immigrants in the Islamic world. In the past two years the operation of IIRO has grown thanks to the support of the Saudi Royal family. Tarek says that the IIRO relies on donations of the Saudi people and some donations from the Islamic world.</p> <p>The IIRO, a Saudi charity deeply involved in terrorist financing, donated at least \$280,000 to the Tulkarm committee and other Palestinian organizations linked to Hamas.</p> <p>In 1996, authorities determined that IIRO and WAMY, another group associated with al-Qaeda, had funded Hamas through Interpal. In documents confiscated at the time, recipient Hamas organizations were asked to send than-you letters directly to IIRO and WAMY rather than to Interpal. Investigators have also tied Interpal to the Holy Land Foundation for Relief and Development (the largest Hamas front organization in the United States when it was shut in December 2001) and to Shykh al-Moayad of the al-Aqsa International Foundation. As</p>	
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	<p>proof of his ability “to get money to the Jihad,” al-Moayad offered an FBI informant a receipt showing that he had transferred \$70,000 to Interpal.</p> <p>The IIRO has materially supported terror around the globe, including Osama Bin Laden and al Qaeda. IIRO’s office in the Philippines is headed by Osama bin Laden’s brother-in-law, Defendant Mohammed Jamal Khalifa and has acted as a center of terrorist financing and training activity – across the globe. IIRO then evolved into a vast independent terrorist machine – funding, recruiting and aiding and abetting al Qaeda members around the globe. IIRO was involved with the 1993 World Trade Center bombing. The perpetrators were trained in al-Qaeda camp, they used al-Qaeda manuals, and they received al-Qaeda funding-through Khalifa and the IIRO. IIRO was also involved in the plot to destroy the Lincoln Tunnel and the Brooklyn Bridge, the plot to assassinate former President William Jefferson Clinton and Pope John Paul II, the plot to blow up twelve American airplanes simultaneously, and the 1998 Embassy bombings in East Africa.</p> <p>Tarek Bin Laden is a financial supporter of the Grand Mufti of Russia, Talgat Tadzhuddin who issued a fatwa calling for jihad against America in 2003. Tarek Bin Laden has traveled to Russia to meet with the Grand Mufti and has supported his activities in connection with Islamic terrorists in Chechnya.</p> <p>Even after the Soviet withdrawal from Afghanistan, the Bin Laden Organization and its officers, including Tarek, Omar, and Bakr Bin Laden, remained at the center of international jihadist recruitment, training, and transit network.</p> <p>Tarek, Omar, and Bakr Bin Laden have continued to permit their worldwide network of family companies to be used as covers for the expansion of global jihad. In 2001, French Intelligence reported that Souren Sarkissian, a director, with Bakr Bin Laden, of Binladen-BEMCO Electrical & Mechanical Industrial & Power Contracting Co. Ltd, “hosted Islamic extremists at rue Marbeau, Paris, during [the jihadists’] visit to France.”</p> <p>In direct contradiction to the Bin Laden family’s</p>	
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	<p>assertions that they have neither had contact with nor provided support to Osama bin Laden during the 1990s, Omar bin Laden and Haider bin Laden opened a Union Bank of Switzerland (UBS), or United Bank of Switzerland, account (account no. Co-565167) on August 17, 1990 which lists Osama bin Laden as the sole “economic beneficiary” of the account and names Osama bin Laden and Yeslam bin Laden as the account’s only signatories.</p> <p>Omar and Haider bin Laden both gave the address of SBG, P.O. Box 958, Jeddah, Saudi Arabia to open the account.</p> <p>An amount of \$450,000 was transferred to the account on August 20, 1990. On October 25, 1991, an amount of \$482,000 was transferred to the Saudi American Bank in Jeddah. Because Osama Bin Laden was the sole economic beneficiary on the account, it is reasonably believed that he was the recipient of these funds. The account was closed on October 9, 1997.</p> <p>In December 2004, French counterterrorism prosecutors expanded their investigation into the Bin Laden family financing of al Qaeda, which was initiated in December 5, 2001, as a result of testimony provided to French judicial authorities by Yeslam bin Laden in September 2004.</p> <p>In testimony before French terrorism prosecutor Renaud Van Ruymbeke, Yeslam bin Laden, brother of Tarek, Bakr, Omar, and Osama bin Laden, described how the account at UBS was created to “redistribute family funds” and confirmed that Osama bin Laden was the sole beneficiary of the account.</p> <p>Swiss and French terrorism prosecutors believe the account was exploited by the Bin Laden brothers as a vehicle for secretly transferring funds to Osama bin Laden and his al Qaeda network via bank accounts in Pakistan.</p> <p>An ongoing investigation by Swiss and French judicial authorities has further uncovered that the UBS account was one of 54 shell accounts used by Yeslam, Tarek, Omar, Bakr, and Osama Bin Laden to hide Bin Laden family assets and provide a secret infrastructure for illicitly transferring funds to Osama bin Laden throughout</p>	
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	<p>the 1990s.</p> <p>By the late 1990s, the Bin Laden family moved much of its financial support for Osama Bin Laden and al Qaeda to secret bank accounts in the Kingdom of Saudi Arabia and Switzerland. It directed funds to these accounts via a network of shell corporations and affiliated accounts in off-shore tax havens such as the Bahamas and the Cayman Islands.</p> <p>In addition, Bakr, Omar, Tarek Bin Laden collaborated with their brother Yeslam Bin Laden to activate an international network of couriers and intermediaries who moved money between the Middle East and al Qaeda operations in Afghanistan, Pakistan, Bosnia, and Chechnya via banks such as National Commercial Bank and Al Rajhi Banking and Investment.</p> <p>Bakr Bin Laden maintained an account at SDGT Bank Al Taqwa Ltd. Bahamas from 1995 to 1998. Year-end account balances during these years ranged from \$1 million in 1995 to \$2.3 million in 1997.</p> <p>In 1997, Bakr Bin Laden and other family members held at least \$1 million in the bank's <i>mudarabah</i> investment accounts. Agence France Presse and the U.S. Department of Treasury reported that terrorist fundraisers were annually transferring \$60 million for Hamas through Bank al Taqwa accounts, during this time. Furthermore, the Treasury Department report mentioned that Bank Al Taqwa appeared to be providing a clandestine line of credit to close associates of Osama bin Laden.</p> <p>A significant portion of Bakr and Ghaleb Mohammed bin Laden's (brothers of Osama) financial portfolio at Bank Al Taqwa was an investment of \$1,000,000 to \$2,473,966 in a <i>mudarabah</i> account (account no. CA/20326) which was independently managed by the bank's directors. However, as the designated signatory authority on the account, Bakr Bin Laden would have been required to approve this investment in the <i>mudarabah</i> account.</p> <p>According to leading authorities on Islamic banking:</p> <p style="padding-left: 40px;">...as a matter of principle the owner of the capital does not have a right to interfere in</p>	
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	<p>to <i>[sic]</i> the management of the business enterprise which is the sole responsibility of the Agent.</p> <p>Authorities have also stated:</p> <p style="padding-left: 40px;">there is no legal impediment to the bank's paying <i>zakah</i> from the accounts of its investors so long as it does so with their <i>zakah portions</i>" from their <i>mudarabah</i> investors, such as Bakr Bin Laden.</p> <p>Bakr bin Laden's attorney acknowledges that Bank Al Taqwa was managing Bakr bin Laden's funds with his authorization "<i>Mudaraba</i> is managed by Al Taqwa Bank ..."</p> <p>Bank Al Taqwa required its investors to comply with its "own obligations of <i>zakat</i>" and "would give [these] funds to fundamentalist groups."</p> <p>Bank Al Taqwa diverted funds from investors' accounts to terrorist entities, but only after the investor authorized the <i>zakat</i> funds to be withdrawn from the <i>mudarabah</i> accounts in compliance with <i>shariah</i>.</p> <p>Bakr Bin Laden would have been required to authorize the <i>zakat</i> withdrawal from the Bin Laden <i>mudarabah</i> account for which he served as the authorized signatory with the knowledge that these funds could have been used for the material support of terrorism.</p> <p>The co-director of SDGT Bank Al Taqwa, Youssef Nada, a senior leader of the Muslim Brotherhood terrorist movement for decades and principal financier of al Qaeda, has explicitly acknowledged, "I manage [Bank Al-Taqwa] portfolios myself."</p> <p>Youssef Nada acknowledges that Bank Al Taqwa was publicly under investigation for financing terrorism as early as 1995.</p> <p>Q: A report of the United States Treasury Department, published in 1999, mentioned that fund transfer companies compose a sanctuary for terrorist and criminal bodies,</p>	
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	<p>those companies have been used to support terrorism. Do you think that...?</p> <p>A: Well, I cannot exclude that because we started facing the problems publicly from 1995; they were escalated in 1997 and reached the peak in this final situation in 2000-2001.</p> <p>Bakr Bin Laden authorized Youssef Nada and Bank Al Taqwa to independently invest and/or divert his funds via <i>zakat</i> to outside entities, even when Bakr Bin Laden knew or should have known, as early as 1995 that Youssef Nada and Bank Al Taqwa were under investigation for laundering funds for the purpose of financing international terrorism.</p> <p>On November 7, 2001, Bank Al-Taqwa, its affiliated business, and key executives were designated as financial supporters of Osama bin Laden and al Qaeda by President George W. Bush. In announcing the designation of Al-Taqwa as a global terrorist entity, President Bush stated:</p> <p style="padding-left: 40px;">Al Taqwa is an association of offshore banks and financial management firms that have helped al Qaeda shift money around the world. Al Taqwa raises money for Al Qaeda. They manage, invest, and distribute those funds...They present themselves as legitimate businesses, but they skim money from <u>every</u> transaction for the benefit of terrorist organizations.</p> <p>Yves Bruderlerin, the director of Cambridge Engineering, Ltd., a SBG subsidiary suspected of having financial connections to Osama Bin Laden and al Qaeda, notes substantial financial connections between Bakr, Omar, and Tarek Bin Laden, as leaders of the Bin Laden family financial empire, and SDGT Bank al-Taqwa:</p> <p>Q: Do you have connections with the company known as Al-Taqwa Bank owned by [SDGT Youseff] Nada?</p> <p>A: No. There are important transfers of several million dollars, but they are always transfers within</p>	
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	<p>Saudi Binladin Group or its subsidiary companies or with the profits of its leaders.</p> <p>Shortly after the September 11th attacks, and despite worldwide outrage at Osama Bin Laden and the savage acts perpetrated by his terrorist network, the Bin Laden family decided to continue its financial and material support of Osama Bin Laden and al Qaeda.</p> <p>The family dedicated 50 million Saudi Riyals to the protection of Osama and al Qaeda's senior leadership. The ongoing protection of Osama Bin Laden is being funded by Bakr Bin Laden, Tarek Bin Laden, and Omar Bin Laden.</p> <p>To protect the family's interests against investigation and prosecution by the Saudi regime, Bakr, Tarek and Omar Bin Laden have raised millions of dollars in funds for the Saudi royal family and have granted free shares in the SBG companies to preferred members of the Saudi royal family.</p> <p>Bakr Bin Laden contributed \$1.5 million to the Arab Thought Foundation (ATF), a charity funded with at least \$17 million from Saudi royalty and businessmen, including Saleh Abdullah Kamel, a terrorism financier and member of the Golden Chain. Kamel is a member of the Board of Trustees for AFT, along with others who have materially supported the jihadi movements associated with terrorism.</p> <p>Bakr bin Laden and The Saudi Bin Laden Group were both identified as contributors to Osama bin Laden's terrorist activities via the 'Golden Chain'.</p> <p>In March 2002, the Bosnian police found several documents and items regarding the history of Al-Qaeda during searches in the offices of Benevolence International Foundation (BIF) in Sarajevo. A computer file labeled "Tareekh Osama", or "Osama History", contained scanned images of several documents, including a list known as the 'Golden Chain,' that according to the US government is "a list of people referred to within Al Qaeda as the 'Golden Chain' or wealthy donors to mujahideen efforts".</p>	
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	<p>Caucasus. Further on, moneys are transferred to banks in Turkey (such as "Ga-rangi Bankasyfindik-Zade", Turkish Lira account No. 6617080; US Dollar account No. 9009606; and, DM account No. 9009607; and the "Turkendianet-bank"), to be cashed and delivered to the Chechen territory and then spent for payments to mercenaries and procurement of the necessary arms and equipment.</p> <p>As the foregoing demonstrates, Bakr Bin Laden, Omar Bin Laden, and Tarek Bin Laden have thereby knowingly, for a period of many years, provided critical financial and logistical support to al Qaeda, and/or Radical Muslim Terrorism, and/or the International Islamic Front for the Jihad Against Jews and Crusaders, to support the terrorist organization's global jihad. The September 11th Attack was a direct, intended and foreseeable product of the aforementioned Bin Ladens' participation in the jihad campaign for al Qaeda, and/or Radical Muslim Terrorism, and/or the International Front for the Jihad Against Jews and Crusaders.</p>	
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